

**Meeting Minutes Transmittal – Approval**

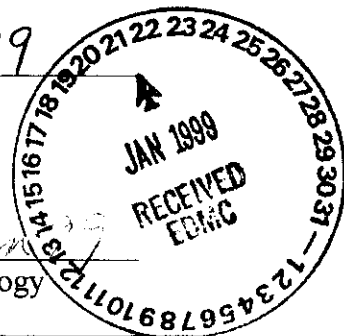
**Project Managers Meeting  
300 AREA WASTE ACID TREATMENT SYSTEM  
Federal Building, Conference Room 590-A  
Richland, Washington**

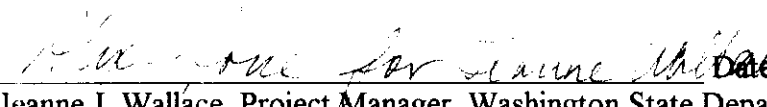
**Meeting Held October 8, 1998  
From 3:30 PM to 4:00 PM**

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The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Project Managers Meeting.

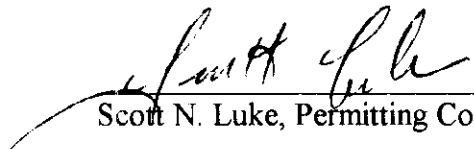
  
Ellen M. Mattlin, Project Manager, RL

Date: 1/5/99

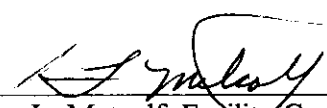
  
Jeanne J. Wallace, Project Manager, Washington State Department of Ecology

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**300 Area WATS, Contractor Concurrence**

  
Scott N. Luke, Permitting Contractor Representative, WMH

Date: 11/5/98

  
Ivan L. Metcalf, Facility Contractor Representative, BWHC

Date: 12/15/98

  
M. DeLeon, Project Hanford Management Contractor Representative, FDH

Date: Jan 4 '99

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**Purpose: Discuss Permitting Process**

Meeting Minutes are attached. The minutes are comprised of the following:

Attachment 1 - Meeting Agenda

Attachment 2 - Summary of Discussion and Commitments/Agreements

Attachment 3 - Attendance List

Attachment 4 – Minutes of September 3, 1998 RCRA/CERCLA Interface Meeting

## **Attachment 1**

### **Project Managers Meeting 300 AREA WASTE ACID TREATMENT SYSTEM Federal Building, Conference Room 590-A Richland, Washington**

**Meeting Held October 8, 1998  
From 3:30 PM to 4:00 PM**

### **Agenda**

1. Approval of Past PMM Minutes
2. Status PMM Action Items
3. Closure Activities Closure Plan Approval (DOE/RL-90-11, Rev 2)
  - NOD response resolution
    - NOD Response Table
    - Closure plan status
  - Phase 2 Closure (333, 334-A, 303-F Buildings)
    - Phase 2 Closure approval
  - Phase 3 Closure (334-TF, 311-TF, WUPT)
    - Phase 3 DIP (HNF-2814-0) approval
    - Status closure activities
4. New Business
5. Schedule Next Closure Plan Approval Workshop
6. Schedule Next Project Managers Meeting

## **Attachment 2**

### **Project Managers Meeting 300 AREA WASTE ACID TREATMENT SYSTEM Federal Building, Conference Room 590-A Richland, Washington**

**Meeting Held October 8, 1998  
From 3:30 PM to 4:00 PM**

#### **Summary of Discussion and Commitments/Agreements**

**1. Approval of Past PMM Minutes**

August and September PMM minutes were still being reviewed by attendees and so were not ready for signature.

**2. Status PMM Action Items**

None

**3. Closure Activities**

- **Closure Plan Approval (DOE/RL-90-11, Rev 2)**
  - **NOD response resolution.** WMH (Luke) reported that the NOD Response Table was being revised to reflect the WATS partial closure approach agreed to by Ecology and EPA at the WATS RCRA/CERCLA interface meeting held September 3 at the Richland EPA office. The signed minutes of that meeting are attached (Attachment 4). At the September meeting Ecology reserved judgment as to whether the partial closure approach would resolve all of the WATS closure plan NODs remaining open. In a phone call September 16, 1998, Ecology (Davis) notified WMH (Luke) that the approach would.
  - **Closure plan status.** WMH (Luke) indicated that the closure plan was being revised to reflect the partial closure approach. A draft of the closure plan was on schedule to be provided to Ecology in early December.

- **Phase 2 Closure (333, 334-A, 303-F Buildings)**

**Phase 2 Closure Approval.** At the last PMM, it was reported that Phase 2 closure activities were complete and the Phase 2 closure areas had been inspected by the certifying PE and Ecology. RL has since received a letter from Ecology dated September 17, 1998 formally concurring with the Phase 2 DIP (HNF-1784, Revision 1) and indicating that the activities were in accordance with the DIP.

- **Phase 3 Closure (334 Tank Farm, 311 Tank Farm, WUPT)**

- **Phase 3 Decontamination and Inspection Plan (DIP).** Funding issues were still a consideration with regard to planning and performing Phase 3 closure activities. However, the Phase 3 DIP (HNF-2814-0) was in progress and it was hoped that a draft of the plan could be to Ecology early on in November so that workshops could begin as soon as possible.
- **Status closure activities.** To-date, Phase 3 closure activities have been limited to planning and waste characterization sampling.

**4. New Business**

Mr. Alex Stone was introduced as the new Ecology Project Manager, taking the place of Ms. Jeanne Wallace. A WATS familiarization tour was scheduled for Alex on October 21, 1998.

**5. Schedule Next Closure Plan Approval Workshop**

The next workshop was not planned at this time.

**6. Schedule Next Project Managers Meeting**

The next 300 Area WATS PMM was scheduled for November 5, 1998.

**Project Managers Meeting  
300 AREA WASTE ACID TREATMENT SYSTEM  
Federal Building, Conference Room 590-A  
Richland, Washington**

## Attendance List

[illegible]

**Attachment 4**

**Project Managers Meeting  
300 AREA WASTE ACID TREATMENT SYSTEM  
Federal Building, Conference Room 590-A  
Richland, Washington**

**Meeting Held October 8, 1998  
From 3:30 PM to 4:00 PM**

**Minutes of the September 3, 1998 WATS RCRA/CERCLA Interface Meeting**

Environmental  
Restoration  
Contractor

# **ERC Team**

## **Meeting Minutes**

Job No. 22192

Written Response Required No  
Due Date: N/A  
Actionee: N/A  
Closes CCN: N/A  
OU: 300-FF-2  
TSD: 300 WATS (TS-3-1)  
ERA: N/A  
Subject Code: 8280

**SUBJECT** RCRA/CERCLA Interface for Closure of the 300 Area Waste Acid Treatment System

**TO** Distribution

**FROM** L. C. Hulstrom *LC Hulstrom*

**DATE** September 3, 1998

### **ATTENDEES**

N. A. Ballantyne N1-26  
C. E. Corriveau H0-17  
G. P. Davis B5-18  
D. R. Einan B5-01  
R. L. Guillen L1-03  
L. C. Hulstrom H9-03  
S. N. Luke H6-24  
E. M. Mattlin A5-15  
R. G. McLeod H0-12  
J. A. Remaize L6-26  
D. W. Templeton R3-79  
J. J. Wallace B5-18  
C. D. Wollam R3-56

### **DISTRIBUTION**

Attendees  
Document and Information Services H0-09

A meeting was held on September 3, 1998, in the conference room at the U.S. Environmental Protection Agency in Richland, Washington, to discuss several RCRA/CERCLA integration issues. The meeting was attended by the U.S. Department of Energy, Richland Operations (RL), the Environmental Restoration Contractor (ERC), the U.S. Environmental Protection Agency, the Washington State Department of Ecology, and several Project Hanford Management Contractor (PHMC) representatives.

### **The following topics were discussed:**

S. Luke presented a handout (Attached) proposing 'partial' RCRA closure of the 300 Area Waste Acid Treatment System (WATS) RCRA TSD. This would include transition of WATS from EM-60 to EM-40 to complete disposition of "unclosed" soils in conjunction with the 300-FF-2 CERCLA OU remedial action and to complete WATS RCRA closure. The handout also identified the RCRA/CERCLA interfaces associated with the transition. After the presentation, RL (R. G. McLeod) asked for regulatory concurrence with the approach. Both the EPA (D. R. Einan) and Ecology (G. P. Davis) noted that they accepted the approach. Ms. Davis indicated that she wanted to review the outstanding WATS NODs related to the 313 South and the WATS and U-Bearing Piping Trench (WUPT) to verify that the proposed WATS transition resolved the NODs. A response from Ecology was anticipated by September 8.

Other subjects discussed briefly included the following:

061571

- 1) PHMC staff updated attendees on the status of the 300-FF-2 waste site dispositioning task that has been initiated. This same process that has been recently completed for PNNL waste sites in the 300-FF-2 OU was also briefly discussed by ERC staff.
- 2) The issue of uranium as related to the 303K Contaminated Waste Storage facility was discussed. It remains RL's position that Ecology does not have authority over uranium. This issue is to be elevated to higher levels (possibly the IAMIT meeting) for further discussion and resolution.

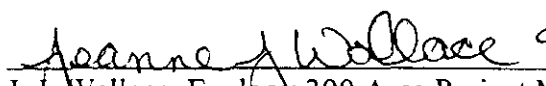
**The following action items were accepted:**

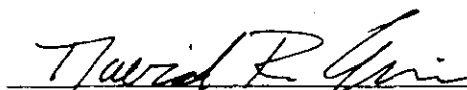
- 1) G. Davis would respond to S. Luke as to whether the proposed approach for 300 WATS satisfied the outstanding NODs by September 8, 1998.

**The following agreements were made:**

By signature given below, the following parties agree to 'partial' closure of WATS as presented in the attachment. Transition of the unit to EM-40 for completion of RCRA closure will occur once endpoint criteria are agreed to and have been met.

 *Sept. 21, 1998*  
R. G. McLeod, RL 300 Area Project Manager

 *9/24/98*  
J. J. Wallace, Ecology 300 Area Project Manager

 *22 Sept 98*  
D. R. Einan, EPA 300 Area Project Manager



**RCRA/CERCLA INTERFACE FOR 300 AREA  
WASTE ACID TREATMENT SYSTEM CLOSURE**

**September 3, 1998**

- **Purpose**

**Summarize WATS locations and workscope that will be transitioned from EM-60 to EM-40 for completion in conjunction with the 300-FF-2 CERCLA Operable Unit (OU) remedial action.**

- **Background**

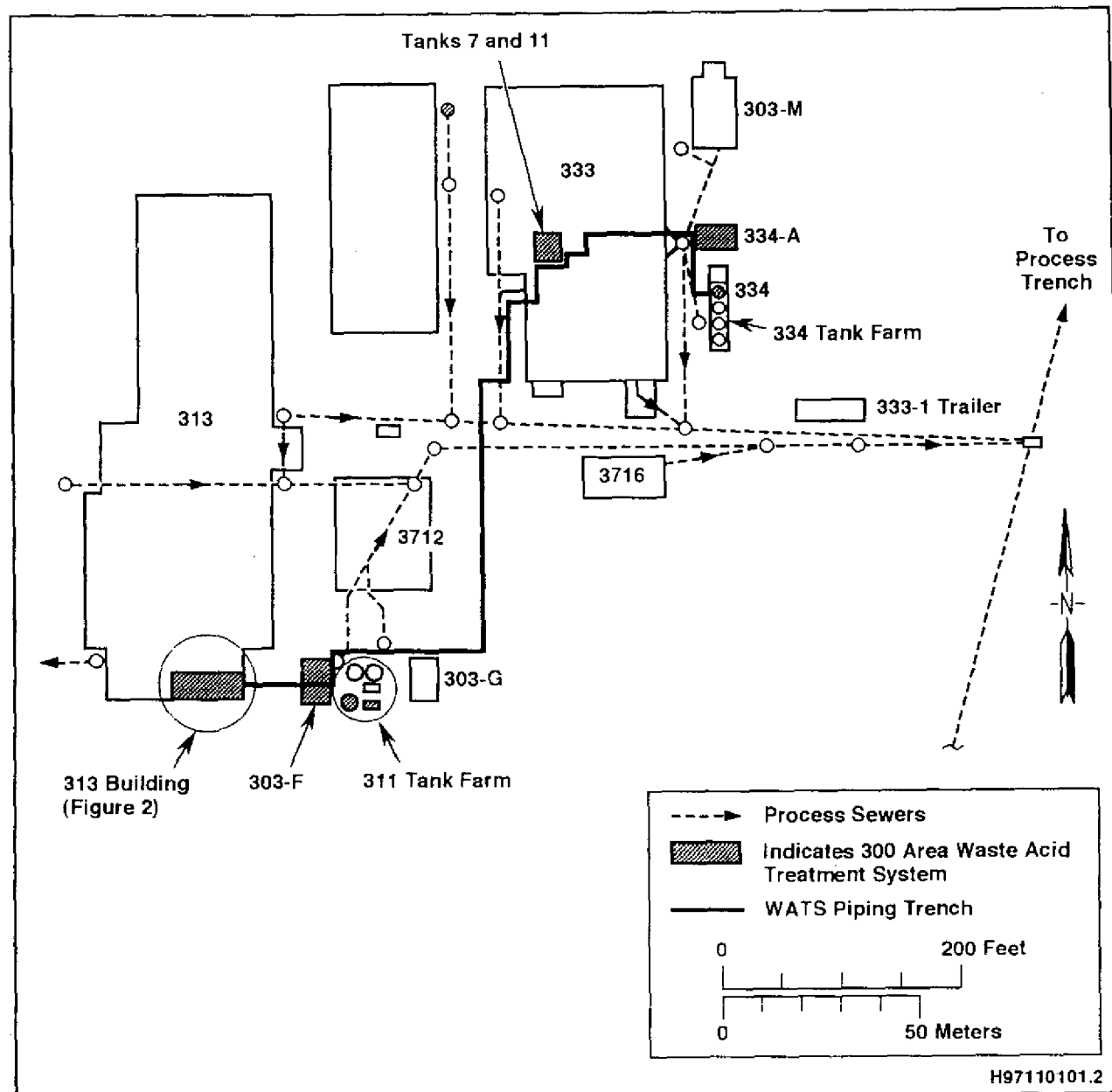
- **WATS is clean closing above-ground structures and components in 3 phases over 3 years (planned completion 1999). Phase 1 is complete and accepted, Phase 2 is complete and under approval, Phase 3 (1999) is in planning.**

- **Most soils will close based on no potential impact from RCRA operations. Soils that will not close are areas of past-practice, contamination impacted by WATS operations - the 313 South and the WATS and U-Bearing Piping Trench (WUPT).**

- The '313 South' is a room of the 313 Building that has documented, subfloor contamination from past-practice activities (WIDS UPR-300-038) of the Uranium-Bearing System (UBS).
- The WUPT is a covered, concrete trench constructed in 1961 between multiple 300 Area structures to hold UBS piping and perchlorethylene (PCE) piping (See sketch).
  - . West portion (333 to 313 Building) slopes down to 313 and was constructed with weep holes to the soil.
  - . In 1974 trench was reported as contaminated with uranium and as having severely eroded process sewer connections (UPR-300-040).
  - . WATS piping was added to trench in 1975 and carried similar, radioactive acids as the UBS.
  - . A 380 gallon, non-WATS PCE release occurred in 1981 (UO-81-1).
  - . WATS only releases to the west WUPT came later in 1985 and 1987 - 2 minor spills to an already contaminated location.

- RL programs EM-40 and EM-60 RL have agreed that it is more appropriate and cost-effective for the OU to disposition the locations. The WATS path forward will be:

- . After WATS Phase 3 closure WATS will undergo "partial closure"
- . After completion of Endpoint criteria, the closure plan and open Part A will be transitioned from EM-60 to EM-40 to complete soil disposition and WATS RCRA closure.



- **Rational for Transitioning WATS to EM-40**

- Past-practice and WATS constituents are so similar that sampling can't differentiate between RCRA and past-practice contamination at the 313 South and the WUPT.
- To avoid duplication of effort, characterization should meet both units' needs and so should follow the 300-FF-2 OU remedial action schedule - come after the 300-FF-2 OU ROD and after transition to EM-40.
- Investigative CERCLA sampling would address both units' concerns whereas RCRA sampling would be limited to WATS locations and constituents of concern only.
- D&D of 313 South and the WUPT will use in-process field screening and sampling - not extensive characterization sampling - to direct soil/structure removal and disposal. This sampling would be used to verify RCRA closure saving approximately \$40K.

- No imminent health or environmental risks drive immediate investigation since 300-FF-2 LFI has identified 300-FF-2 OU waste sites as 'low-priority' based on risk. Also, WATS systems will be removed or clean closed with no potential for leaks.

- **RCRA/CERCLA Interface for WATS Transition/Closure**

- Before transition EM-60 will:

- . Meet clean closure standards from 'floor up' at WATS locations
- . Remove all WATS (and other) piping from the WUPT
- . Identify transitioned workscope in the closure plan and in WIDS.
- . After Phase 3, modify closure chapter of Permit and WATS Part A to reflect WATS "partial" closure status, clean closed locations, and "unclosed" soils.

**- After transition to EM-40:**

. RCRA unit to support DQO for CERCLA sampling at WUPT and 313 South so data supports RCRA closure.

**. After remedial action:**

- . PE to certify closure activities
- . Modify WATS Permit to:
  - reconcile CERCLA cleanup to a RCRA closure method (i.e., clean or modified)
  - reference CERCLA work/verification documents
  - provide for any postclosure activities if clean closure not achieved
- . Close out the WATS Part A.

**● Regulator Acceptance**

- EPA and Ecology agree with the above-described WATS transition so that RL can proceed with its implementation.

- Ecology agrees that the above-described WATS transition resolves WATS closure plan NODs for the 313 South and WUPT so that RL can proceed with revising the WATS closure plan accordingly.



Distribution:

N. A. Ballantyne	FDH	N1-26
R. C. Bowman	WMH	H6-24
G. P. Davis	Ecology	B5-18
M. DeLeon	FDH	N1-26
R. L. Guillen	RL	L1-03
M. R. Hahn	RL	R3-79
S. N. Luke	WMH	H6-26
E. M. Mattlin	RL	A5-15
I. L. Metcalf	BWHC	L6-26
J. A. Remaize	BWHC	L6-26
J. W. Rich	BWHC	L6-26
F. A. Ruck	FDH	H6-22
J. M. Steffen	BWHC	N1-47
A. B. Stone	Ecology	B5-18
D. W. Templeton	RL	R3-79
J. J. Wallace	Ecology	B5-18
Field File Custodian	WMH	H6-08
RCRA File	WMH	H6-23

ADMINISTRATIVE RECORD: 300 Area Waste Acid Treatment System Closure Plan,  
TS-3-1 [Care of EDMC, FDH (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Hanford Files,  
P.O. Box 47600, Olympia, Washington 98504-7600

Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail Stop HW-074  
(Record Center)

Please send comments on distribution list to Scott Luke (H6-24),  
(509) 372-1667.